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Attorneys for Defendant
LG.PHILIPS LCD AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Crago Corporation, individually and on behalf
of all those similarly situated,

Plaintiff,

vs.

LG.Philips LCD Co. Ltd., LG.Philips LCD
America, Inc.; Samsung Electronics Co. Ltd.;
Sharp Corporation; Sharp Electronics
Corporation; Toshiba Corporation; Toshiba
Matsushita Display Technology Co., Ltd.;
Hitachi Ltd.; Hitachi Displays, Ltd.; Hitachi
America Ltd.; Hitachi Electronic Devices
(USA), Inc.; Sanyo Epson Imaging Devices
Corporation; NEC Corporation; NEC LCD
Technologies, Ltd.; NEC Electronics America,
Inc.; IDT International Ltd.; AU Optronics;
International Display Technology Co., Ltd.;
International Display Technology USA Inc.;
AU Optronics Corporation America; Chi Mei
Optoelectronics; Chi Mei Optoelectronics
USA, Inc.; Chunghwa Picture Tubes Ltd.;
Hannstar Display Corporation;

Defendants.

CASE NO. C 06-07644 (MMC)

**SECOND AMENDED STIPULATION
AND ~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

Honorable Maxine M. Chesney

1 WHEREAS plaintiff filed a complaint in the above-captioned case on or about
2 December 13, 2006;

3 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid
4 Crystal Display ("LCD") products;

5 WHEREAS at least forty complaints have been filed to date in federal district
6 courts throughout the United States by plaintiffs purporting to bring class actions on behalf of
7 direct and indirect purchasers alleging antitrust violations by manufacturers of LCD products
8 (collectively, "the LCD Cases");

9 WHEREAS there are motions pending before the Judicial Panel on Multidistrict
10 Litigation ("JPML") to transfer the LCD cases to the Northern District of California and the
11 District of New Jersey for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

12 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
13 Complaints in the direct and indirect LCD cases;

14 WHEREAS plaintiff and LG Philips LCD America, Inc. ("LPL America") have
15 agreed that an orderly schedule for any response to the pleadings in this case would be more
16 efficient for the parties and for the Court;

17 WHEREAS plaintiff agrees that the deadline for LPL America to respond to the
18 Complaints in the above-captioned case shall be extended until the earlier of the following two
19 dates: (1) forty-five days after the filing of Consolidated Amended Complaint(s) in the
20 transferee court in which the LCD Cases are consolidated by the JPML; or (2) forty-five days
21 after plaintiffs provide written notice to LPL America that they do not intend to file a
22 Consolidated Amended Complaint, provided that such notice may be given only after the initial
23 case management conference in the MDL transferee court in this case;

24 WHEREAS plaintiff further agrees that this extension is available, without further
25 stipulation with counsel for plaintiff to all named defendants who notify plaintiff in writing of
26 their intention to join this extension;

27 WHEREAS this Stipulation does not constitute a waiver by LPL America or any
28 other defendant of any defense, including but not limited to the defenses of lack of personal or

1 subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or
2 improper venue.

3 WHEREAS LPL America (and any other named defendant who provides notice of
4 its intention to join this extension provided by this Stipulation) agrees that, notwithstanding the
5 other terms of this Stipulation, should it respond to any complaint in another LCD case filed in
6 another United States District Court prior to the date contemplated by this Stipulation (except
7 pursuant to Court Order), then it shall make a simultaneous response to the complaint in the
8 above-captioned matter.

9 PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR
10 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AND AGREE AS
11 FOLLOWS:

12 1. The deadline for LPL America to respond to any Complaint in the above-
13 captioned case shall be extended until the earlier of the following two dates: (1) forty-five days
14 after the filing of Consolidated Amended Complaint(s) in the transferee court in which the LCD
15 Cases are consolidated by the JPML; or (2) forty-five days after plaintiffs provide written notice
16 to LPL America that they do not intend to file a Consolidated Amended Complaint, provided that
17 such notice may be given only after the initial case management conference in the MDL
18 transferee court in this case.

19 2. This extension is available, without further stipulation with counsel for
20 plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of
21 their intention to join this extension.

22 3. This Stipulation does not constitute a waiver by LPL America or any
23 defendant of any other defense, including but not limited to the defenses of lack of personal or
24 subject matter jurisdiction, insufficiency of process, insufficiency of service of process, or
25 improper venue.

26 4. Notwithstanding the other terms of this Stipulation, should LPL America
27 (and other named defendant who provides notice of its intention to join this extension provided by
28 this Stipulation) respond to any complaint in another LCD case filed in another United States

District Court prior to the date contemplated by this Stipulation (except pursuant to Court Order), then it shall make a simultaneous response to the complaint in the above-captioned matter.

IT IS SO STIPULATED.

DATED: February 6, 2007

Respectfully submitted,

MUNGER, TOLLES & OLSON LLP

By: /s/ Jerome C. Roth
JEROME C. ROTH
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LG.PHILIPS LCD AMERICA, INC

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DATED: February 6, 2007

SAVERI & SAVERI, INC.

By: /s/ R. Alexander Saveri
GUIDO SAVERI
R. ALEXANDER SAVERI
CADIO ZIRPOLI
Attorneys for Plaintiff
CRAGO CORPORATION

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: February 7, 2007


Honorable Maxine M. Cheney
Judge of the United States District Court